

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Sarah Chadwick

Case No.

Case: 2:23-mj-30450

Assigned To : Unassigned

Assign. Date : 11/9/2023

CMP USA V CHADWICK (LH)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 17, 2022 in the county of Oakland and elsewhere in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*

18 U.S.C. § 2252A(a)(2)

18 U.S.C. § 2252A(a)(5)(B)

*Offense Description*

Receipt and distribution of child pornography

Possession of and/or access with intent to view child pornography, or attempt  
to possess or access with intent to view child pornography

This criminal complaint is based on these facts:

see attached affidavit.

☒ Continued on the attached sheet.


Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: November 9, 2023

City and state: Detroit, Michigan

*Complainant's signature*

Amy M. Hirina, Special Agent (FBI)

*Printed name and title**Judge's signature*

Hon. Anthony P. Patti, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**  
**AND ARREST WARRANT**

I, Amy M. Hirina, a Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I have been employed as a Special Agent of the FBI since 2005, and am currently assigned to the FBI Detroit Division, Oakland County Resident Agency. While employed by the FBI, I have investigated federal criminal violations involving the online sexual exploitation of children. I have gained experience through training at the FBI Academy, post-Academy training, and everyday work related to conducting these types of investigations.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute arrest warrants issued under the authority of the United States.

3. This affidavit is made in support of an application for a criminal complaint and arrest warrant for SARAH CHADWICK (DOB XX/XX/1993) for violation of 18 U.S.C. § 2252A(a)(2) (receipt and distribution of child pornography) and 18 U.S.C. § 2252A(a)(5)(B) (possession of and/or access with intent to view child pornography, or attempt to possess or access with intent to view child pornography).

## **SUMMARY OF PROBABLE CAUSE**

4. The Federal Bureau of Investigation (FBI) is investigating SARAH CHADWICK, for possession, receipt and distribution of child pornography. A phone number associated with Sarah Chadwick engaged in sexually explicit conversations and received child sexually abusive material (CSAM) from INDIVIDUAL 1. INDIVIDUAL 1 was arrested on April 24, 2023, in the Northern District of Ohio for Title 18 USC 2423(b) travel with intent to engage in illicit sexual conduct and Title 18 USC 2422(b) coercion or enticement. Through interviews and surveillance, telephone 248-513-5599 is associated with Sarah Chadwick who resides at an address in Pontiac, Michigan. On November 8, 2023, a search warrant was executed at CHADWICK's residence, and CHADWICK voluntarily spoke with agents and made admissions.

## **PROBABLE CAUSE**

5. On or about April 24, 2023, INDIVIDUAL 1 was arrested in the Northern District of Ohio for Title 18 USC 2423(b) travel with intent to engage in illicit sexual conduct and Title 18 USC 2422(b) coercion or enticement. At the time of arrest, a Samsung Galaxy phone was seized from INDIVIDUAL 1's vehicle. On or about April 24, 2023, a search warrant for the Samsung Galaxy phone was issued in the Northern District of Ohio.

6. An extraction of the Samsung Galaxy phone revealed the following instant messages between +1XXXXXX4217 (Samsung Galaxy), and +1248513599 (Tilly Wojahn<sup>1</sup>) on 12/13/2022:

+12485135599	Yeah wickr is being dumb????
Samsung Galaxy	[three blue emoji hearts]
+12485135599	I need to update it
+12485135599	[Image of a drawn heart]
Samsung Galaxy	I don't mind. We can talk here. But no videos, it's not encrypted.

7. An extraction of the Samsung Galaxy phone revealed the following instant messages between +1XXXXXX4217 (Samsung Galaxy), and +12485135599 (Tilly Wojahn) on 12/17/2022:

Samsung Galaxy	[Attachment video000000.mp4 depicts a female approximately twelve years old sitting nude on the floor engaging in oral sex with an adult male standing over her.]
+12485135599	yes daddy

8. An extraction of the Samsung Galaxy phone revealed the following instant messages between +1XXXXXX4217 (Samsung Galaxy), and +12485135599 (Tilly Wojahn) on 12/19/2022:

+12485135599	I love hearing you call yourself a pedo daddy
+12485135599	It makes me so wet
Samsung Galaxy	Just wait until I show you. Feed cum to our babys straight from my cock and shoot into their tight little fuckholes.

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<sup>1</sup> The extraction report for the Samsung Galaxy phone listed the instant message participant as "+2485135599 Tilly Wojahn." A message from "+2485135599 Tilly Wojahn" on 12/13/2022 states "Heu its Tilly???" and +1XXXXXX4217 (Samsung Galaxy) responded "Hello baby girl."

+12485135599	Fuck yes daddy
Samsung Galaxy	Hold them open and milk my cock for me baby girl.
+12485135599	Mmmm yes daddy
+12485135599	I want to have family orgies
Samsung Galaxy	I think that will happen as soon as they are old enough to fuck.
Samsung Galaxy	We have to be careful when the girls start having their periods

9. An extraction of the Samsung Galaxy phone revealed the following Telegram<sup>2</sup> messages between Telegram users XXXXXX1383 Raleighman (owner) and 5522935748 (Tilly Wojahn) on 12/21/2022:

Telegram Username	Telegram Messages
Raleighman	You sending all your cp?
Tilly Wojahn	A large majority of it
Raleighman	I have a bunch too.
Tilly Wojahn	Give you something to destress with while youre busy with your book
Raleighman	At least I can send you the longer vids here.
	[Messages continue, to include the exchange of numerous files with content no longer available.]
Raleighman	I live you my cp loving slut.
Tilly Wojahn	Ok i have more for later
Raleighman	Me too.
Tilly Wojahn	Fuck i love that last one
Tilly Wojahn	I sent you a few infants, i hope you dont mind?
Raleighman	No. Not at all
Tilly Wojahn	And a few rapes
Raleighman	I like those.

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<sup>2</sup> Telegram- A messaging application that uses end to end encryption. Users can send messages, photographs, and video files to unlimited audiences.

10. A search of Clear revealed telephone number 248-513-5599 was associated with INDIVIDUAL 2 and SARAH CHADWICK (DOB XX/XX/1993).

11. On or about December 27, 2022 and December 28, 2022, +248-513-5599 sent selfie images to +1XXXXXX4217 (Samsung Galaxy). The individual pictured in the selfie images is visually similar to SARAH CHADWICK's driver's license photograph.


12. On November 8, 2023, a search was executed at CHADWICK's residence in Pontiac, Michigan. CHADWICK agreed to speak with the FBI at their office. CHADWICK advised the FBI would find child pornography images and videos on her phone. CHADWICK used Wickr, Whatsapp, and Telegram to send/receive child pornography. CHADWICK admitted to taking a few photographs of a minor known and close to her when that minor was approximately eight years old, which would be approximately six years ago. The photographs were of the nude backside of the eight-year-old standing up in the bathtub. CHADWICK sent these photographs to user "Bear" on Whatsapp.

13. A Pixel phone was seized at the residence during the search warrant. CHADWICK confirmed the Pixel phone belonged to her. Numerous image and video files were observed on the phone that were sent/received on Telegram and Whatsapp. The files contained minors engaging in sexual activity, to include infants and toddlers.


## CONCLUSION

14. Based on the communications, review of the Pixel phone, and CHADWICK's admissions, I believe that probable cause exists that SARAH CHADWICK (DOB XX/XX/1993) violated 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B) (receipt and distribution of child pornography, and possession of and/or access with intent to view child pornography or attempt to possess or access with intent to view child pornography).

Respectfully submitted,

  
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Amy M. Hirina, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

  
\_\_\_\_\_  
Hon. Anthony P. Patti  
United States Magistrate Judge

Date: November 9, 2023